

Honorable Salvador Mendoza, Jr.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON  
AT SPOKANE

TYLER JAMES THOMAS  
LANKFORD,

Plaintiff,

vs.

CITY OF PULLMAN; COUNTY OF  
WHITMAN; STATE OF  
WASHINGTON; OFFICER JOSHUA  
BRAY; OFFICER ALEX GORDON;  
DETECTIVE TODD DOW; OFFICER  
GREG UMBRIGHT; OFFICER JUSTIN  
DEROSIER; OFFICER MIKE  
PETLOVANY; OFFICER BRIAN  
CHAMBERLAIN; SERGEANT SAM  
SOREM; and DOES I-X,

Defendants.

) Case No. 2:16-cv-00377-SMJ

) **NOTICE OF FILING PAPER OR**  
) **PHYSICAL MATERIALS WITH**  
) **THE CLERK**

1. A true and correct copy of the Sergeant Sam Sorem and Sherry Bailey  
Video Interview, recorded via Sam Sorem's body camera and produced by City of  
Pullman Police Department, and referenced in the Declaration of Darryl Parker in

1 Support of Plaintiff's Motion for Summary Judgment as Exhibit "A," is being filed  
2 in physical form with the Clerk's Office for the Eastern District of Washington.  
3 The item will remain in the Clerk's custody until appropriate disposition pursuant  
4 to the Local Rules of the Eastern District of Washington.  
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7 2. A true and correct copy of the audio call between Kathleen Lynch and  
8 the Dispatcher, recorded by the City of Pullman Police Department, and referenced  
9 in the Declaration of Darryl Parker in Support of Plaintiff's Motion for Summary  
10 Judgment as Exhibit "C," is being filed in physical form with the Clerk's Office for  
11 the Eastern District of Washington. The item will remain in the Clerk's custody  
12 until appropriate disposition pursuant to the Local Rules of the Eastern District of  
13 Washington.  
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17 3. A true and correct copy of the phone call between Sherry Bailey,  
18 Joshua Bray, and Alex Gordon, and a true and correct copy of the phone call  
19 between Kathleen Lynch, Joshua Bray, and Alex Gordon, audio recorded by the  
20 City of Pullman Police Department, and referenced in the Declaration of Darryl  
21 Parker in Support of Plaintiff's Motion for Summary Judgment as Exhibit "E," is  
22 being filed in physical form with the Clerk's Office for the Eastern District of  
23 Washington. The item will remain in the Clerk's custody until appropriate  
24 disposition pursuant to the Local Rules of the Eastern District of Washington.  
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1           4.     A true and correct copy of the audio call between Kathleen Lynch and  
2 Alex Gordon, audio recorded by the City of Pullman Police Department, with  
3 additional audio recordings played for Alex Gordon over the phone that were  
4 recorded by Kathleen Lynch, and referenced in the Declaration of Darryl Parker in  
5 Support of Plaintiff's Motion for Summary Judgment as Exhibit "F," is being filed  
6 in physical form with the Clerk's Office for the Eastern District of Washington.  
7 The item will remain in the Clerk's custody until appropriate disposition pursuant  
8 to the Local Rules of the Eastern District of Washington.

13           5.     A true and correct copy of the July 27, 2015 video of Tyler Lankford  
14 being taken into protective custody, video recorded by the City of Pullman Police  
15 Department, and referenced in the Declaration of Darryl Parker in Support of  
16 Plaintiff's Motion for Summary Judgment as Exhibit "K," is being filed in physical  
17 form with the Clerk's Office for the Eastern District of Washington. The item will  
18 remain in the Clerk's custody until appropriate disposition pursuant to the Local  
19 Rules of the Eastern District of Washington.

24           DATED this 3<sup>rd</sup> of November, 2017.

26                           CIVIL RIGHTS JUSTICE CENTER, PLLC

28                           /s/ Darryl Parker

29                           **Darryl Parker**, WSBA #30770

30                           Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

I, Rachelle Stefanski, under penalty of perjury under the laws of the State of Washington, declare as follows:

I am a resident of the State of Washington, over eighteen years of age, and not a party to the within action. I hereby certify that on November 3, 2017, I electronically filed the foregoing NOTICE OF FILING PAPER OR PHYSICAL MATERIALS WITH THE CLERK and this CERTIFICATE OF SERVICE with the Clerk of the Court using the CM/ECF system which will send notification of the filing to all counsel of record.

Executed on November 3, 2017, at Seattle, Washington.

/s/ Rachelle Stefanski

Rachelle Stefanski, Legal Assistant